

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of: Public Safety and
Homeland Security Bureau Seeks
Comment on 9-1-1 Resiliency and
Reliability in Wake of June 29, 2012,
Derecho Storm in Central, Mid-
Atlantic, and Northeastern United
States.

PS Docket No. 11-60

**REPLY COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES
COMMISSION AND THE PEOPLE OF THE STATE OF
CALIFORNIA**

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September 4, 2012

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The California Public Utilities Commission and the People of the State of California (CPUC or California) submit these reply comments in response to the Federal Communications Commission (FCC or Commission) Public Safety and Homeland Security Bureau's July 18, 2012, Public Notice (Notice) seeking comment on 9-1-1 resiliency and reliability specifically related to a June 29, 2012 derecho storm, as well as 9-1-1 resiliency and reliability generally.¹

The availability of backup power plays a critical role in allowing carriers to keep their facilities operational during and after disasters such as the derecho.² Wireless carriers noted in their comments that the loss of commercial power was the primary cause of cell site outages after the derecho.³ Wireline carriers similarly found the lack of commercial power to be the predominant cause of their system outages.⁴ Consequently, without commercial power, communications networks would fail unless they had alternative power supplies.

The CPUC again urges the Commission to consider re-adopting backup power requirements for communications facilities, in particular for wireless facilities, upon which consumers increasingly rely.⁵ From Verizon Communication Inc.'s and Frontier Communication Corporation's comments, it appears that wireline facilities have both

¹ See generally, Public Safety And Homeland Security Bureau Seeks Comment On 9-1-1 Resiliency And Reliability In Wake Of June 29, 2012, Derecho Storm In Central, Mid-Atlantic, And Northeastern United States, *Public Notice*, DA-12-1153, PS Docket No. 11-60, rel. July 18, 2012 ("*Derecho Storm Public Notice*").

² See e.g., AT&T Comments at 5 (Aug. 17, 2012); Frontier Comments at 2 (Aug. 17, 2012), T-mobile Comments at 4 (Aug. 17, 2012); Verizon Comments at 3 (Aug. 17, 2012).

³ See AT&T Comments at 5 (Aug. 17, 2012); T-mobile Comments at 4 (Aug. 17, 2012); Verizon Comments at 3 (Aug. 17, 2012).

⁴ See Frontier Comments at 4 (Aug. 17, 2012); Verizon Comments at 3 (Aug. 17, 2012).

⁵ See In the Matter of Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks, *Order on Reconsideration*, EB Docket No. 06-119, 22 FCC Rcd 18013 (F.C.C.

batteries and backup generators as their source of backup power,⁶ with Verizon's supply lasting at least 24 hours and up to 72 hours.⁷ However, data the CPUC obtained from California wireless carriers indicates that cell sites have significantly less backup power than wireline facilities. Of the data received from the state's largest wireless providers, over 90% of the cell sites in California have backup power supplies, but a majority of these sites have supplies that last *less* than eight hours. Whether this duration is reasonable, given the strong likelihood of disasters that impact telecommunications facilities and infrastructure for more than eight hours, is an issue the CPUC urges the

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⁶ See e.g., Frontier Comments at 4 (Aug. 17, 2012); Verizon Comments at 3 (Aug. 17, 2012).

⁷ Verizon Comments at 9 (Aug. 17, 2012).

Commission to reconsider. In particular, we believe the Commission should revisit the backup power rules in its October 2, 2007, vacated order.⁸

Respectfully submitted,

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⁸ See In the Matter of Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks, *Order on Reconsideration*, EB Docket No. 06-119, 22 FCC Rcd 18013 (F.C.C. 2007).